

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>VIRGINIA G. STUNTEBECK,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>JANSSEN RESEARCH &amp; DEVELOPMENT, LLC f/k/a JOHNSON AND JOHNSON PHARMACEUTICAL RESEARCH AND DEVELOPMENT LLC.; JANSSEN ORTHO, LLC, JANSSEN PHARMACEUTICALS, INC. f/k/a JANSSEN PHARMACEUTICA INC., f/k/a ORTHO-MCNEIL-JANSSEN PHARMACEUTICALS, INC., BAYER CORPORATION, BAYER AG, BAYER HEALTHCARE LLC, and BAYER HEALTHCARE PHARMACEUTICALS INC., and JOHN DOES 1-100,</b>  <b>Defendants.</b>	<b>C.A. No. 2:14-cv-01097-JHS</b>  <b>Jury Trial Demanded</b>
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**PLAINTIFF VIRGINIA G. STUNTEBECK'S, NOTICE OF MOTION TO REMAND  
PURSUANT TO 28 U.S.C. § 1447(c)**

Plaintiff Virginia G. Stuntebeck, by and through counsel, respectfully moves to Remand the Plaintiff's Complaint to the Court of Common Pleas of Philadelphia County, where it was originally and properly filed, as the Defendant's removal violates 28 U.S.C.A. § 1441(b), is otherwise procedurally infirm and for the reasons to be set forth in an accompanying Memorandum of Law. A proposed form or Order is attached hereto as Exhibit "A".

Dated: March 26, 2014

Respectfully submitted,

**NAPOLI BERN RIPKA SHKOLNIK &  
ASSOC., LLP**

By: /s/ W. Steven Berman

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